

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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JUSTYNA ZUBKO-VALVA, as Mother and Natural Guardian
of ANTHONY VALVA and ANDREW VALVA, and as
Administratrix of the Estate of THOMAS VALVA,
and JUSTYNA ZUBKO-VALVA individually,

20 Civ. 02663-ERK-ARL

Plaintiffs,

-against-

THE COUNTY OF SUFFOLK, CPS
SENIOR CASEWORKER MICHELE CLARK, Individually
and in her Official Capacity, CPS SUPERVISOR
EDWARD HEEPE, Individually and in his Official
Capacity, CPS ASSISTANT DIRECTOR ROBERT LETO,
Individually and in his Official Capacity, CPS
INVESTIGATOR JENNIFER LANTZ, Individually
and in her Official Capacity CPS
INVESTIGATOR MELISSA ESTRADA, Individually and
in her Official Capacity, CPS INVESTIGATOR
LYDIA SABOSTO, Individually and in her Official
Capacity, CPS SUPERVISOR JEAN MONTAGUE,
Individually and in her Official Capacity, DEPARTMENT
OF SOCIAL SERVICES COUNTY ATTORNEY
RANDALL RATJE, ESQ., Individually and in his
Official Capacity, ATTORNEY FOR CHILDREN DONNA
MCCABE, ESQ., Individually and in her Official
Capacity, THE LAW OFFICE OF DONNA MCCABE,
SHANA CURTI, ESQ., Individually and in her Official
Capacity, ORSETTI & CURTI PLLC, EAST
MORICHES UNION FREE SCHOOL
DISTRICT, PRINCIPAL EDWARD SCHNEYER,
Individually and in his Official Capacity, SCHOOL
SUPERINTENDENT CHARLES RUSSO, Individually and
in his Official Capacity, HOPE SCHWARTZ
ZIMMERMAN, Individually, ATTORNEY FOR
CHILDREN ETHAN HALPERN, ESQ, Individually and in
his Official Capacity, THE LEGAL AID SOCIETY of
SUFFOLK COUNTY, INC., CHILDREN'S LAW
BUREAU, MICHAEL VALVA, and ANGELA POLLINA,

**ANSWER TO
COMPLAINT**

Defendants.

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Defendants, the Legal Aid Society of Suffolk County, Inc. and Ethan Halpern, individually
and in his official capacity, (collectively "Defendants" or "Answering Defendants") by and

through their attorneys, Rivkin Radler LLP, answer the allegations of the Plaintiffs' Complaint, as follows:

PRELIMINARY STATEMENT

1. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 1 of the Complaint and deny that Thomas Valva's death was foreseeable to Defendants.

2. Deny the allegations contained in Paragraph 2 of the Complaint.

3. Deny the allegations contained in Paragraph 3 of the Complaint.

4. Deny the allegations contained in Paragraph 4 of the Complaint.

5. Deny the allegations contained in Paragraph 5 of the Complaint.

6. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 6 of the Complaint.

7. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 7 of the Complaint.

8. Deny the allegations contained in Paragraph 8 of the Complaint.

9. Deny the allegations contained in Paragraph 9 of the Complaint.

JURISDICTION

10. Paragraph 10 of the Complaint does not contain allegations of fact, but rather legal conclusions and Defendants respectfully refers all questions of law to the Court for adjudication.

11. Paragraph 11 of the Complaint does not contain allegations of fact, but rather legal conclusions and Defendants respectfully refers all questions of law to the Court for adjudication.

12. Paragraph 12 of the Complaint does not contain allegations of fact, but rather legal conclusions and Defendants respectfully refers all questions of law to the Court for adjudication.

13. Admit that Plaintiffs are demanding a trial by jury.

PARTIES

14. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 14 of the Complaint.

15. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 15 of the Complaint.

16. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 16 of the Complaint.

17. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 17 of the Complaint.

18. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 18 of the Complaint.

19. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 19 of the Complaint.

20. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 20 of the Complaint.

21. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 21 of the Complaint.

22. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 22 of the Complaint.

23. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 23 of the Complaint.

24. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 24 of the Complaint.

25. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 25 of the Complaint.

26. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 26 of the Complaint.

27. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 27 of the Complaint.

28. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 28 of the Complaint.

29. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 29 of the Complaint.

30. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 30 of the Complaint.

31. Admit that Attorney Halpern is an attorney employed by Legal Aid Society of Suffolk County, Inc., Children's Law Bureau, 320 Carleton Avenue, Central Islip, New York and that he was appointed by the Family Court in Suffolk County as the Attorney for the Children in neglect proceedings before the Honorable Bernard Cheng. Deny all other allegations in Paragraph 31 of the Complaint.

32. Admit the allegations contained in Paragraph 32 of the Complaint.

33. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 33 of the Complaint.

34. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 34 of the Complaint.

FACTUAL ALLEGATIONS

35. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 35 of the Complaint.

36. Deny that Tommy's death was foreseeable by the Answering Defendants and deny knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in Paragraph 36 of the Complaint.

37. Deny the allegations contained in Paragraph 37 of the Complaint as directed against the Answering Defendants and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

38. Deny the allegations contained in Paragraph 38 of the Complaint as directed against the Answering Defendants and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

39. Deny the allegations contained in Paragraph 39 of the Complaint as directed against the Answering Defendants and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

40. Deny the allegations contained in Paragraph 40 of the Complaint as directed against the Answering Defendants and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

41. Deny the allegations contained in Paragraph 41 of the Complaint as directed against the Answering Defendants and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

42. Deny the allegations contained in Paragraph 42 of the Complaint as directed against the Answering Defendants and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

43. Deny the allegations contained in Paragraph 43 of the Complaint as directed against the Answering Defendants and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

44. Deny the allegations contained in Paragraph 44 of the Complaint as directed against the Answering Defendants and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

45. Deny the allegations contained in Paragraph 45 of the Complaint as directed against the Answering Defendants and deny knowledge or information sufficient to form a belief as to the remaining allegations.

46. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 46 of the Complaint.

47. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 47 of the Complaint.

48. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 48 of the Complaint.

49. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 49 of the Complaint.

50. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 50 of the Complaint.

51. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 51 of the Complaint.

52. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 52 of the Complaint.

53. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 53 of the Complaint.

54. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 54 of the Complaint.

55. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 55 of the Complaint.

56. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 56 of the Complaint.

57. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 57 of the Complaint.

58. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 58 of the Complaint.

59. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 59 of the Complaint.

60. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 60 of the Complaint.

61. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 61 of the Complaint.

62. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 62 of the Complaint.

63. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 63 of the Complaint.

64. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 64 of the Complaint.

65. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 65 of the Complaint.

66. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 66 of the Complaint.

67. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 67 of the Complaint.

68. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 68 of the Complaint.

69. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 69 of the Complaint.

70. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 70 of the Complaint.

71. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 71 of the Complaint.

72. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 72 of the Complaint.

73. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 73 of the Complaint.

74. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 74 of the Complaint.

75. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 75 of the Complaint.

76. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 76 of the Complaint.

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78. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 78 of the Complaint.

79. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 79 of the Complaint.

80. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 80 of the Complaint.

81. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 81 of the Complaint.

82. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 82 of the Complaint.

83. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 83 of the Complaint.

84. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 84 of the Complaint.

85. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 85 of the Complaint.

86. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 86 of the Complaint.

87. Paragraph 87 of the Complaint does not contain allegations of fact, but rather quotes from a portion of the Family Court Act, which speaks for itself.

88. Paragraph 88 of the Complaint does not contain allegations of fact, but rather quotes from a portion of the Family Court Act, which speaks for itself.

89. Paragraph 89 of the Complaint does not contain allegations of fact, but rather conclusions of law and Defendants respectfully refers all questions of law to the Court for adjudication.

90. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 90 of the Complaint.

91. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 91 of the Complaint.

92. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 92 of the Complaint.

93. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 93 of the Complaint.

94. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 94 of the Complaint.

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101. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 101 of the Complaint.

102. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 102 of the Complaint.

103. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 103 of the Complaint.

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116. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 116 of the Complaint.

117. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 117 of the Complaint.

118. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 118 of the Complaint.

119. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 119 of the Complaint.

120. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 120 of the Complaint.

121. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 121 of the Complaint.

122. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 122 of the Complaint.

123. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 123 of the Complaint.

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125. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 125 of the Complaint.

126. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 126 of the Complaint.

127. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 127 of the Complaint.

128. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 128 of the Complaint.

129. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 129 of the Complaint.

130. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 130 of the Complaint.

131. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 131 of the Complaint.

132. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 132 of the Complaint.

133. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 133 of the Complaint.

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137. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 137 of the Complaint.

138. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 138 of the Complaint.

139. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 139 of the Complaint.

140. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 140 of the Complaint.

141. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 141 of the Complaint.

142. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 142 of the Complaint.

143. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 143 of the Complaint.

144. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 144 of the Complaint.

145. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 145 of the Complaint.

146. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 146 of the Complaint.

147. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 147 of the Complaint.

148. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 148 of the Complaint.

149. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 149 of the Complaint.

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151. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 151 of the Complaint.

152. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 152 of the Complaint.

153. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 153 of the Complaint.

154. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 154 of the Complaint.

155. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 155 of the Complaint.

156. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 156 of the Complaint.

157. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 157 of the Complaint.

158. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 158 of the Complaint.

159. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 159 of the Complaint.

160. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 160 of the Complaint.

161. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 161 of the Complaint.

162. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 162 of the Complaint.

163. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 163 of the Complaint.

164. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 164 of the Complaint.

165. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 165 of the Complaint.

166. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 166 of the Complaint.

167. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 167 of the Complaint.

168. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 168 of the Complaint.

169. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 169 of the Complaint.

170. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 170 of the Complaint.

171. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 171 of the Complaint.

172. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 172 of the Complaint.

173. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 173 of the Complaint.

174. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 174 of the Complaint.

175. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 175 of the Complaint.

176. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 176 of the Complaint.

177. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 177 of the Complaint.

178. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 178 of the Complaint.

179. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 179 of the Complaint.

180. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 180 of the Complaint.

181. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 181 of the Complaint.

182. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 182 of the Complaint.

183. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 183 of the Complaint.

184. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 184 of the Complaint.

185. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 185 of the Complaint.

186. Deny the allegations contained in Paragraph 186 of the Complaint.

187. Deny the allegations contained in Paragraph 187 of the Complaint.

188. Deny the allegations contained in Paragraph 188 of the Complaint.

189. Deny the allegations contained in Paragraph 189 of the Complaint.

190. Deny the allegations contained in Paragraph 190 of the Complaint.

191. Deny the allegations contained in Paragraph 191 of the Complaint.

192. Deny the allegations contained in Paragraph 192 of the Complaint.

193. Deny the allegations contained in Paragraph 193 of the Complaint.

194. Deny the allegations contained in Paragraph 194 of the Complaint.

195. Deny the allegations contained in Paragraph 195 of the Complaint.

196. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 196 of the Complaint.

197. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 197 of the Complaint.

198. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 198 of the Complaint.

199. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 199 of the Complaint.

200. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 200 of the Complaint.

201. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 201 of the Complaint.

202. Admit that Judge Bernard Cheng dismissed the Neglect Petition against Plaintiff and deny knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in Paragraph 202 of the Complaint.

203. Admit that Judge Cheng issued a Decision and Order dated April 12, 2019, which speaks for itself.

204. Admit that Plaintiffs quote a portion of Judge Cheng's April 12, 2019, Decision and Order, which speaks for itself, and deny knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in Paragraph 204 of the Complaint.

205. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 205 of the Complaint.

206. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 206 of the Complaint.

207. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 207 of the Complaint.

208. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 208 of the Complaint.

209. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 209 of the Complaint.

210. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 210 of the Complaint.

211. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 211 of the Complaint.

212. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 212 of the Complaint.

213. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 213 of the Complaint.

214. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 214 of the Complaint.

215. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 215 of the Complaint.

216. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 216 of the Complaint.

217. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 217 of the Complaint.

218. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 218 of the Complaint.

219. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 219 of the Complaint.

220. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 220 of the Complaint.

221. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 221 of the Complaint.

222. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 222 of the Complaint.

223. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 223 of the Complaint.

224. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 224 of the Complaint.

225. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 225 of the Complaint.

226. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 226 of the Complaint.

227. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 227 of the Complaint.

228. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 228 of the Complaint.

229. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 229 of the Complaint.

230. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 230 of the Complaint.

231. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 231 of the Complaint.

232. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 232 of the Complaint.

233. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 233 of the Complaint.

234. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 234 of the Complaint.

235. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 235 of the Complaint.

236. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 236 of the Complaint.

237. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 237 of the Complaint.

238. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 238 of the Complaint.

239. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 239 of the Complaint.

240. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 240 of the Complaint.

241. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 241 of the Complaint.

242. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 242 of the Complaint.

243. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 243 of the Complaint.

244. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 244 of the Complaint.

245. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 245 of the Complaint.

246. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 246 of the Complaint.

247. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 247 of the Complaint.

248. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 248 of the Complaint.

249. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 249 of the Complaint.

250. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 250 of the Complaint.

251. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 251 of the Complaint.

252. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 252 of the Complaint.

253. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 253 of the Complaint.

254. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 254 of the Complaint.

255. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 255 of the Complaint.

256. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 256 of the Complaint.

257. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 257 of the Complaint.

258. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 258 of the Complaint.

259. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 259 of the Complaint.

260. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 260 of the Complaint.

261. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 261 of the Complaint.

262. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 262 of the Complaint.

263. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 263 of the Complaint.

264. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 264 of the Complaint.

265. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 265 of the Complaint.

266. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 266 of the Complaint.

267. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 267 of the Complaint.

268. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 268 of the Complaint.

269. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 269 of the Complaint.

270. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 270 of the Complaint.

271. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 271 of the Complaint.

272. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 272 of the Complaint.

273. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 273 of the Complaint.

274. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 274 of the Complaint.

275. Deny the allegations contained in Paragraph 275 of the Complaint as directed against the Answering Defendants and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

276. Deny the allegations contained in Paragraph 276 of the Complaint as directed against the Answering Defendants and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

277. Deny the allegations contained in Paragraph 277 of the Complaint as directed against the Answering Defendants and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

278. Deny the allegations contained in Paragraph 278 of the Complaint as directed against the Answering Defendants and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

279. Deny the allegations contained in Paragraph 279 of the Complaint as directed against the Answering Defendants and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

**AS AND FOR DEFENDANTS' RESPONSE
TO PLAINTIFFS' FIRST CAUSE OF ACTION**

280. Defendants repeat and incorporate their responses to the preceding paragraphs as if fully set forth herein.

281. Plaintiffs' First Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph 281 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

282. Plaintiffs' First Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph 282 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

283. Plaintiffs' First Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph 283 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

284. Plaintiffs' First Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph 284 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

285. Plaintiffs' First Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph 285 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

286. Plaintiffs' First Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph

286 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

287. Plaintiffs' First Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph 287 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

288. Plaintiffs' First Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph 288 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

289. Plaintiffs' First Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph 289 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

290. Plaintiffs' First Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph 290 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

291. Plaintiffs' First Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph 291 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

292. Plaintiffs' First Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph 292 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

293. Plaintiffs' First Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph 293 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

294. Plaintiffs' First Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph 294 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

295. Plaintiffs' First Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph

295 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

296. Plaintiffs' First Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph 296 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

297. Plaintiffs' First Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph 297 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

298. Plaintiffs' First Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph 298 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

299. Plaintiffs' First Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph 299 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

AS AND FOR DEFENDANTS' RESPONSE
TO PLAINTIFFS' SECOND CAUSE OF ACTION

300. Defendants repeat and incorporate their responses to the preceding paragraphs as if fully set forth herein.

301. Plaintiffs' Second Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph 301 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

302. Plaintiffs' Second Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph 302 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

303. Plaintiffs' Second Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph 303 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

304. Plaintiffs' Second Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph 304 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

305. Plaintiffs' Second Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph 305 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

306. Plaintiffs' Second Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph 306 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

307. Plaintiffs' Second Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph 307 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

308. Plaintiffs' Second Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph 308 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

309. Plaintiffs' Second Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph

309 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

310. Plaintiffs' Second Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph 310 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

311. Plaintiffs' Second Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph 311 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

312. Plaintiffs' Second Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph 312 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

AS AND FOR DEFENDANTS' RESPONSE
TO PLAINTIFFS' THIRD CAUSE OF ACTION

313. Defendants repeat and incorporate their responses to the preceding paragraphs as if fully set forth herein.

314. Plaintiffs' Third Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph

314 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

315. Plaintiffs' Third Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph 315 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

316. Plaintiffs' Third Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph 316 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

317. Plaintiffs' Third Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph 317 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

318. Plaintiffs' Third Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph 318 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

AS AND FOR DEFENDANTS' RESPONSE
TO PLAINTIFFS' FOURTH CAUSE OF ACTION

319. Defendants repeat and incorporate their responses to the preceding paragraphs as if fully set forth herein.

320. Plaintiffs' Fourth Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph 320 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

321. Plaintiffs' Fourth Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph 321 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

322. Plaintiffs' Fourth Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph 322 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

323. Plaintiffs' Fourth Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph 323 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

324. Plaintiffs' Fourth Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph 324 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

**AS AND FOR DEFENDANTS' RESPONSE
TO PLAINTIFFS' FIFTH CAUSE OF ACTION**

325. Defendants repeat and incorporate their responses to the preceding paragraphs as if fully set forth herein.

326. Plaintiffs' Fifth Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph 326 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

327. Plaintiffs' Fifth Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph 327 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

328. Plaintiffs' Fifth Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph 328 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

329. Plaintiffs' Fifth Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph 329 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

330. Plaintiffs' Fifth Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph 330 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

331. Plaintiffs' Fifth Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph 331 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

AS AND FOR DEFENDANTS' RESPONSE
TO PLAINTIFFS' SIXTH CAUSE OF ACTION

332. Defendants repeat and incorporate their responses to the preceding paragraphs as if fully set forth herein.

333. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 333 of the Complaint.

334. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 334 of the Complaint.

335. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 335 of the Complaint.

336. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 336 of the Complaint.

337. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 337 of the Complaint.

338. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 338 of the Complaint.

**AS AND FOR DEFENDANTS' RESPONSE
TO PLAINTIFFS' SEVENTH CAUSE OF ACTION**

339. Defendants repeat and incorporate their responses to the preceding paragraphs as if fully set forth herein.

340. Plaintiffs' Seventh Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph 340 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

341. Plaintiffs' Seventh Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph 341 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

342. Plaintiffs' Seventh Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants

is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph 342 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

343. Plaintiffs' Seventh Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph 343 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

344. Plaintiffs' Seventh Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph 344 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

**AS AND FOR DEFENDANTS' RESPONSE
TO PLAINTIFFS' EIGHTH CAUSE OF ACTION**

345. Defendants repeat and incorporate their responses to the preceding paragraphs as if fully set forth herein.

346. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 346 of the Complaint.

347. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 347 of the Complaint.

348. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 348 of the Complaint.

349. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 349 of the Complaint.

350. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 350 of the Complaint.

351. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 351 of the Complaint.

352. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 352 of the Complaint.

353. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 353 of the Complaint.

354. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 354 of the Complaint.

355. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 355 of the Complaint.

356. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 356 of the Complaint.

357. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 357 of the Complaint.

358. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 358 of the Complaint.

359. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 359 of the Complaint.

360. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 360 of the Complaint.

361. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 361 of the Complaint.

362. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 362 of the Complaint.

**AS AND FOR DEFENDANTS' RESPONSE
TO PLAINTIFFS' NINTH CAUSE OF ACTION**

363. Defendants repeat and incorporate their responses to the preceding paragraphs as if fully set forth herein.

364. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 364 of the Complaint.

365. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 365 of the Complaint.

366. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 366 of the Complaint.

367. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 367 of the Complaint.

368. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 368 of the Complaint.

369. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 369 of the Complaint.

370. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 370 of the Complaint.

371. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 371 of the Complaint.

372. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 372 of the Complaint.

373. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 373 of the Complaint.

374. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 374 of the Complaint.

375. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 375 of the Complaint.

376. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 376 of the Complaint.

377. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 377 of the Complaint.

378. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 378 of the Complaint.

379. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 379 of the Complaint.

380. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 380 of the Complaint.

381. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 381 of the Complaint.

**AS AND FOR DEFENDANTS' RESPONSE
TO PLAINTIFFS' TENTH CAUSE OF ACTION**

382. Defendants repeat and incorporate their responses to the preceding paragraphs as if fully set forth herein.

383. The Answering Defendants deny the allegations contained in Paragraph 383 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

384. The Answering Defendants deny the allegations contained in Paragraph 384 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

**AS AND FOR DEFENDANTS' RESPONSE
TO PLAINTIFFS' ELEVENTH CAUSE OF ACTION**

385. Defendants repeat and incorporate their responses to the preceding paragraphs as if fully set forth herein.

386. The Answering Defendants deny the allegations contained in Paragraph 386 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

387. The Answering Defendants deny the allegations contained in Paragraph 387 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

388. The Answering Defendants deny the allegations contained in Paragraph 388 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

389. The Answering Defendants deny the allegations contained in Paragraph 389 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

**AS AND FOR DEFENDANTS' RESPONSE
TO PLAINTIFFS' TWELFTH CAUSE OF ACTION**

390. Defendants repeat and incorporate their responses to the preceding paragraphs as if fully set forth herein.

391. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 391 of the Complaint.

392. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 392 of the Complaint.

**AS AND FOR DEFENDANTS' RESPONSE
TO PLAINTIFFS' THIRTEENTH CAUSE OF ACTION**

393. Defendants repeat and incorporate their responses to the preceding paragraphs as if fully set forth herein.

394. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 394 of the Complaint.

395. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 395 of the Complaint.

396. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 396 of the Complaint.

**AS AND FOR DEFENDANTS' RESPONSE
TO PLAINTIFFS' FOURTEENTH CAUSE OF ACTION**

397. Defendants repeat and incorporate their responses to the preceding paragraphs as if fully set forth herein.

398. Plaintiffs' Fourteenth Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph 398 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

399. Plaintiffs' Fourteenth Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph 399 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

400. Plaintiffs' Fourteenth Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph 400 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

401. Plaintiffs' Fourteenth Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph 401 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

402. Plaintiffs' Fourteenth Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph

402 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

AS AND FOR DEFENDANTS' RESPONSE
TO PLAINTIFFS' FIFTEENTH CAUSE OF ACTION

403. Defendants repeat and incorporate their responses to the preceding paragraphs as if fully set forth herein.

404. Plaintiffs' Fifteenth Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph 404 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

405. Plaintiffs' Fifteenth Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph 405 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

406. Plaintiffs' Fifteenth Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph 406 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

407. Plaintiffs' Fifteenth Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph

407 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

408. Plaintiffs' Fifteenth Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph 408 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

409. Plaintiffs' Fifteenth Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph 409 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

410. Plaintiffs' Fifteenth Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph 410 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

411. Plaintiffs' Fifteenth Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph 411 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

AS AND FOR DEFENDANTS' RESPONSE
TO PLAINTIFFS' SIXTEENTH CAUSE OF ACTION

412. Defendants repeat and incorporate their responses to the preceding paragraphs as if fully set forth herein.

413. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 413 of the Complaint.

414. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 414 of the Complaint.

415. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 415 of the Complaint.

416. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 416 of the Complaint.

417. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 417 of the Complaint.

418. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 418 of the Complaint.

419. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 419 of the Complaint.

420. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 420 of the Complaint.

421. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 421 of the Complaint.

AS AND FOR DEFENDANTS' RESPONSE
TO PLAINTIFFS' SEVENTEENTH CAUSE OF ACTION

421. Defendants repeat and incorporate their responses to the preceding paragraphs as if fully set forth herein.

422. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 422 of the Complaint.

423. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 423 of the Complaint.

424. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 424 of the Complaint.

425. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 425 of the Complaint.

426. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 426 of the Complaint.

427. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 427 of the Complaint.

428. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 428 of the Complaint.

429. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 429 of the Complaint.

AS AND FOR DEFENDANTS' RESPONSE
TO PLAINTIFFS' EIGHTEENTH CAUSE OF ACTION

430. Defendants repeat and incorporate their responses to the preceding paragraphs as if fully set forth herein.

431. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 431 of the Complaint.

432. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 432 of the Complaint.

433. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 433 of the Complaint.

434. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 434 of the Complaint.

435. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 435 of the Complaint.

436. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 436 of the Complaint.

437. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 437 of the Complaint.

AS AND FOR DEFENDANTS' RESPONSE
TO PLAINTIFFS' EIGHTEENTH CAUSE OF ACTION¹

438. Defendants repeat and incorporate their responses to the preceding paragraphs as if fully set forth herein.

439. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 439 of the Complaint.

440. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 440 of the Complaint.

¹ Plaintiffs' Complaint contains two "Eighteenth" causes of action.

441. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 441 of the Complaint.

442. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 442 of the Complaint.

443. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 443 of the Complaint.

444. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 444 of the Complaint.

445. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 445 of the Complaint.

446. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 446 of the Complaint.

447. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 447 of the Complaint.

448. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 448 of the Complaint.

449. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 449 of the Complaint.

450. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 450 of the Complaint.

451. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 451 of the Complaint.

452. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 452 of the Complaint.

AS AND FOR DEFENDANTS' RESPONSE
TO PLAINTIFFS' NINETEENTH CAUSE OF ACTION

453. Defendants repeat and incorporate their responses to the preceding paragraphs as if fully set forth herein.

454. The Answering Defendants deny the allegations contained in Paragraph 454 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

455. The Answering Defendants deny the allegations contained in Paragraph 455 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

456. The Answering Defendants deny the allegations contained in Paragraph 456 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

457. The Answering Defendants deny the allegations contained in Paragraph 457 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

458. The Answering Defendants deny the allegations contained in Paragraph 458 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

459. The Answering Defendants deny the allegations contained in Paragraph 459 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

460. The Answering Defendants deny the allegations contained in Paragraph 460 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

**AS AND FOR DEFENDANTS' RESPONSE
TO PLAINTIFFS' TWENTIETH CAUSE OF ACTION**

461. Defendants repeat and incorporate their responses to the preceding paragraphs as if fully set forth herein.

462. Plaintiffs' Twentieth Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph 462 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

463. Plaintiffs' Twentieth Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph 463 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

464. Plaintiffs' Twentieth Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph 464 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

465. Plaintiffs' Twentieth Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants

is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph 465 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

466. Plaintiffs' Twentieth Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph 466 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

467. Plaintiffs' Twentieth Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph 467 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

468. Plaintiffs' Twentieth Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph 468 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

469. Plaintiffs' Twentieth Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph 469 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

470. Plaintiffs' Twentieth Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph 470 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

471. Plaintiffs' Twentieth Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph 471 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

472. Plaintiffs' Twentieth Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph 472 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

473. Plaintiffs' Twentieth Cause of Action against the Answering Defendants was dismissed by the Court on June 17, 2022 and, therefore, no response by the Answering Defendants is required. Nevertheless, the Answering Defendants deny the allegations contained in Paragraph 473 of the Complaint as directed against them and deny knowledge or information sufficient to form a belief as to the truth of the allegations as directed against the other defendants.

AS AND FOR DEFENDANTS' RESPONSE
TO PLAINTIFFS' TWENTY FIRST CAUSE OF ACTION

474. Defendants repeat and incorporate their responses to the preceding paragraphs as if fully set forth herein.

475. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 475 of the Complaint.

476. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 476 of the Complaint.

477. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 477 of the Complaint.

478. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 478 of the Complaint.

479. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 479 of the Complaint.

480. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 480 of the Complaint.

481. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 481 of the Complaint.

482. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 482 of the Complaint.

483. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 483 of the Complaint.

484. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 484 of the Complaint.

485. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 485 of the Complaint.

486. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 486 of the Complaint.

AS AND FOR DEFENDANTS' RESPONSE
TO PLAINTIFFS' TWENTY SECOND CAUSE OF ACTION

487. Defendants repeat and incorporate their responses to the preceding paragraphs as if fully set forth herein.

488. Deny the allegations contained in Paragraph 488 of the Complaint.

489. Deny the allegations contained in Paragraph 489 of the Complaint.

490. Deny the allegations contained in Paragraph 490 of the Complaint.

491. Deny the allegations contained in Paragraph 491 of the Complaint.

492. Deny the allegations contained in Paragraph 492 of the Complaint.

493. Deny the allegations contained in Paragraph 493 of the Complaint.

494. Deny the allegations contained in Paragraph 494 of the Complaint.

495. Deny the allegations contained in Paragraph 495 of the Complaint.

496. Deny the allegations contained in Paragraph 496 of the Complaint.

497. Deny the allegations contained in Paragraph 497 of the Complaint.

498. Deny the allegations contained in Paragraph 498 of the Complaint.

499. Deny the allegations contained in Paragraph 499 of the Complaint.

AS AND FOR DEFENDANTS' RESPONSE
TO PLAINTIFFS' TWENTY THIRD CAUSE OF ACTION

500. Defendants repeat and incorporate their responses to the preceding paragraphs as if fully set forth herein.

501. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 501 of the Complaint.

502. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 502 of the Complaint.

503. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 503 of the Complaint.

504. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 504 of the Complaint.

505. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 505 of the Complaint.

506. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 506 of the Complaint.

507. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 507 of the Complaint.

508. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 508 of the Complaint.

509. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 509 of the Complaint.

510. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 510 of the Complaint.

511. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 511 of the Complaint.

512. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 512 of the Complaint.

513. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 513 of the Complaint.

514. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 514 of the Complaint.

AFFIRMATIVE DEFENSES

AS AND FOR A FIRST AFFIRMATIVE DEFENSE

The Complaint fails to state a cause of action for which relief may be granted.

AS AND FOR A SECOND AFFIRMATIVE DEFENSE

Whatever damages Plaintiffs recover as against the Answering Defendants should be reduced pursuant to General Obligations Law Section 15-108.

AS AND FOR A THIRD AFFIRMATIVE DEFENSE

Whatever injuries and/or damages were purportedly sustained by the infant plaintiffs were caused in whole or in part of Plaintiff Justyna Zubko-Valva's acts or omissions.

AS AND FOR A FOURTH AFFIRMATIVE DEFENSE

If plaintiffs sustained any injury or incurred any loss or damages as alleged in the Complaint, the same were caused in whole or in part by acts or omissions of others over whom the Answering Defendants neither exercised nor had any right to control, for which the Answering Defendants are and were not responsible, and whose conduct the Answering Defendants had no duty or reason to anticipate or control.

AS AND FOR A FIFTH AFFIRMATIVE DEFENSE

If the liability of the Answering Defendants is found to be fifty percent (50%) or less of the total liability assigned to all persons liable, the liability of the Answering Defendants to Plaintiffs for non-economic loss shall not exceed the Answering Defendants' equitable share

determined in accordance with the relative culpability of each person causing or contributing to the total liability for non-economic loss, pursuant to Article 16 of the CPLR.

AS AND FOR A SIXTH AFFIRMATIVE DEFENSE

Upon information and belief, any past or future costs and/or expenses incurred or to be incurred by Plaintiffs for medical care, custodial care or rehabilitation services, loss of earnings or other economic loss, has been or will with reasonable certainty be replaced or indemnified in whole or in part from a collateral source as defined in Section 4545(c) of the CPLR. If any damages are recoverable against the Answering Defendants, the amount of such damages shall be diminished by the amount of the funds which Plaintiff have or shall received from such collateral source.

CROSS-CLAIM

AS AND FOR A FIRST CROSS-CLAIM FOR INDEMNIFICATION AND/OR CONTRIBUTION AGAINST THE COUNTY OF SUFFOLK, CPS SENIOR CASEWORKER MICHELE CLARK, Individually and in her Official Capacity, CPS SUPERVISOR EDWARD HEEPE, Individually and in his Official Capacity, CPS ASSISTANT DIRECTOR ROBERT LETO, Individually and in his Official Capacity, CPS INVESTIGATOR JENNIFER LANTZ, Individually and in her Official Capacity, CPS INVESTIGATOR MELISSA ESTRADA, Individually and in her Official Capacity, ATTORNEY FOR CHILDREN DONNA MCCABE, ESQ., Individually and in her Official Capacity, THE LAW OFFICE OF DONNA MCCABE, EAST MORICHES UNION FREE SCHOOL DISTRICT, PRINCIPAL EDWARD SCHNEYER, Individually and in his Official Capacity, SCHOOL SUPERINTENDENT CHARLES RUSSO, Individually and in his Official Capacity, MICHAEL VALVA, and ANGELA POLLINA, THE ANSWERING DEFENDANTS, LEGAL AID SOCIETY OF SUFFOLK COUNTY, INC. and ETHAN HALPERN, Individually and in his Official Capacity, ALLEGE:

If Plaintiffs recover herein, it will be by virtue of the recklessness, carelessness and negligence of the defendants, THE COUNTY OF SUFFOLK, CPS SENIOR CASEWORKER MICHELE CLARK, Individually and in her Official Capacity, CPS SUPERVISOR EDWARD HEEPE, Individually and in his Official Capacity, CPS ASSISTANT DIRECTOR ROBERT LETO, Individually and in his Official Capacity, CPS INVESTIGATOR JENNIFER LANTZ,

Individually and in her Official Capacity, CPS INVESTIGATOR MELISSA ESTRADA, Individually and in her Official Capacity, ATTORNEY FOR CHILDREN DONNA MCCABE, ESQ., Individually and in her Official Capacity, THE LAW OFFICE OF DONNA MCCABE, EAST MORICHES UNION FREE SCHOOL DISTRICT, PRINCIPAL EDWARD SCHNEYER, Individually and in his Official Capacity, SCHOOL SUPERINTENDENT CHARLES RUSSO, Individually and in his Official Capacity, MICHAEL VALVA, ANGELA POLLINA, and not the Answering Defendants, LEGAL AID SOCIETY OF SUFFOLK COUNTY, INC. and ETHAN HALPERN, Individually and in his Official Capacity, and that the Answering Defendants demand complete indemnification from THE COUNTY OF SUFFOLK, CPS SENIOR CASEWORKER MICHELE CLARK, Individually and in her Official Capacity, CPS SUPERVISOR EDWARD HEEPE, Individually and in his Official Capacity, CPS ASSISTANT DIRECTOR ROBERT LETO, Individually and in his Official Capacity, CPS INVESTIGATOR JENNIFER LANTZ, Individually and in her Official Capacity, CPS INVESTIGATOR MELISSA ESTRADA, Individually and in her Official Capacity, ATTORNEY FOR CHILDREN DONNA MCCABE, ESQ., Individually and in her Official Capacity, THE LAW OFFICE OF DONNA MCCABE, EAST MORICHES UNION FREE SCHOOL DISTRICT, PRINCIPAL EDWARD SCHNEYER, Individually and in his Official Capacity, SCHOOL SUPERINTENDENT CHARLES RUSSO, Individually and in his Official Capacity, MICHAEL VALVA, and ANGELA POLLINA, or that the respective degrees of negligence of the Plaintiffs and Defendants be ascertained, determined and adjudicated by and pursuant to Sections 1401, 1402 and 1403 of the CPLR and that the Answering Defendants have judgment over and against Defendants THE COUNTY OF SUFFOLK, CPS SENIOR CASEWORKER MICHELE CLARK, Individually and in her Official Capacity, CPS SUPERVISOR EDWARD HEEPE, Individually and in his Official Capacity,

CPS ASSISTANT DIRECTOR ROBERT LETO, Individually and in his Official Capacity, CPS INVESTIGATOR JENNIFER LANTZ, Individually and in her Official Capacity, CPS INVESTIGATOR MELISSA ESTRADA, Individually and in her Official Capacity, ATTORNEY FOR CHILDREN DONNA MCCABE, ESQ., Individually and in her Official Capacity, THE LAW OFFICE OF DONNA MCCABE, EAST MORICHES UNION FREE SCHOOL DISTRICT, PRINCIPAL EDWARD SCHNEYER, Individually and in his Official Capacity, SCHOOL SUPERINTENDENT CHARLES RUSSO, Individually and in his Official Capacity, MICHAEL VALVA, and ANGELA POLLINA, as to the proportionate share commensurate with the respective degrees of negligence as will be decided at the trial herein.

RESERVATION OF RIGHTS

The Answering Defendants expressly reserve the right to amend this Answer and to assert additional affirmative defenses, and to supplement, alter or change this Answer and affirmative defenses upon revelation of more definitive facts by Plaintiffs and/or upon the Answering Defendants' undertaking of discovery and investigation of this matter. Accordingly, the right to assert additional affirmative defenses, if and to the extent that such affirmative defenses are applicable, is hereby reserved.

WHEREFORE, the Answering Defendants respectfully request that this court enter judgment as follows:

- a. Dismissing Plaintiffs' Complaint;
- b. Granting the Answering Defendants indemnification and/or contribution as against all other defendants.
- c. Granting to Answering Defendants the costs, expenses and disbursements resulting from this litigation, including attorneys' fees; and

d. Awarding such other and further relief as this court deems just, necessary and proper.

Dated: New York, New York
July 25, 2022

RIVKIN RADLER LLP

*Attorneys for Defendants Ethan Halpern, Esq.
and the Legal Aid Society of Suffolk County, Inc.,
Children's Law Bureau*

A handwritten signature in cursive script that reads "Jonathan Bruno".

By: _____

Jonathan B. Bruno
477 Madison Ave., Suite 410
New York, New York 10022-5843
Tel: (212) 455-9555
Fax: (212) 687-9044
Email: jonathan.bruno@rivkin.com